

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DOCKET NO. UE-19____

EXHIBIT NO. ____ (TCD-2)

THOMAS C. DEMPSEY

REPRESENTING AVISTA CORPORATION

August 31, 2018

Gordon Criswell
Talen Montana, LLC
Colstrip Steam Electric Station
P.O. Box 38
Colstrip, MT 59323

Sent via email to: Gordon.criswell@talenergy.com

RE: Request for information related to compliance with Mercury & Air Toxics Standard

Dear Mr. Criswell:

The Montana Department of Environmental Quality (Department) requests additional information regarding recent filterable particulate matter (PM) emissions tests and related facility operations at the Colstrip Steam Electric Station (CSES).

Talen Montana, LLC (Talen) conducted PM emissions testing at CSES on June 21, 2018 and June 26, 2018 for Units 3 and 4, respectively. Test results indicated, and the Source Test Report submitted by CSES confirmed, that CSES was operating in excess of the applicable emission limit contained in Title 40 Code of Federal Regulations Part 63 (40 CFR 63) Subpart UUUUU, also referred to as the Mercury & Air Toxics Standard (MATS).

To fully address the extent of this matter, DEQ requests that Talen provide the following information:

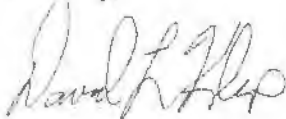
1. The daily calculation of the weighted 30-boiler operating day rolling average emission rate (WAER) for each of Units 1-4 as specified by Equation 2a at §63.10009(b)(2), from September 8, 2016 to present. The calculation must identify the emissions rate used for each unit and the source of the 30-day total heat input (HI) for that unit for each daily calculation. Provide a description of the calculation methodology, including rationale for the chosen methodology, and citation of applicable rules to justify the methodology used.
2. Records of the daily heat input (HI) for each of Units 1-4 from September 8, 2016 to present. Please clearly demonstrate how these daily HI values are used in calculating the WAER.
3. Records of the occurrence and duration of each startup and/or shut down for each of Units 1-4 from September 8, 2016 to present. Provide a narrative description of how Talen complies with the work practice standards of MATS during these occurrences and demonstrate how these situations are addressed in the WAER calculations.

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4. A description of all non-routine work performed, any operational changes, and any changes to the coal supply or quality at Units 3 and 4 for the period between the fourth quarter 2017 and the second quarter 2018 that may have impacted the PM emissions performance.
5. A description of all inspection, maintenance, and operation activities associated with the boilers and venturi scrubbers since the deviations.
6. Records of the date and time (start and end) for each period of noncompliance from June 21, 2018 to present.

The Department is requesting this information, subject to Section V.A.4 of Talen's Operating Permit (OP0513-14), be submitted no later than September 17, 2018. Should Talen have any questions or concerns, please contact me at (406) 444-0286 or dklemp@mt.gov. Thank you for your attention to this matter.

Sincerely,



David L. Klemp
Air Quality Bureau Chief
Montana Department of Environmental Quality